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Kurt A. Gustafson, Francois Lebel, William L. Ashton,
Nora E. Brennan, Seth H.Z. Fischer, Jeffrey L. Vacirca,
Dolatrai M. Vyas, Bernice R. Welles, Stuart Krassner,
Raymond W. Cohen, Anthony E. Maida,
and Elizabeth A. Czerepak and for
Nominal Defendant Spectrum Pharmaceuticals Inc*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LEO SHUMACHER, Derivatively on Behalf
of SPECTRUM PHARMACEUTICALS INC.,

Plaintiff

v.

JOSEPH W. TURGEON, KURT A.
GUSTAFSON, FRANCOIS LEBEL,
WILLIAM L. ASHTON, NORA E.
BRENNAN, SETH H.Z. FISCHER, JEFFREY
L. VACIRCA, DOLATRAI M. VYAS,
BERNICE R. WELLES, STUART
KRASSNER, RAYMOND W. COHEN,
ANTHONY E. MAIDA, and ELIZABETH A.
CZEREPAK,

Defendants

and

SPECTRUM PHARMACEUTICALS INC.,

Nominal Defendant

CASE NO. 2:22-cv-00466-CDS-DJA

**STIPULATION OF DISMISSAL OF
PLAINTIFF'S VERIFIED
DERIVATIVE COMPLAINT**

Plaintiff Leo Schumacher ("Plaintiff"), derivatively and on behalf of nominal defendant Spectrum Pharmaceuticals Inc. ("Spectrum" or the "Company"), and defendants Joseph W. Turgeon, Kurt A. Gustafson, Francois Lebel, William L. Ashton, Nora E. Brennan, Seth H.Z. Fischer, Jeffrey L. Vacirca, Dolatrai M. Vyas, Bernice R. Welles, Stuart Krassner, Raymond W. Cohen, Anthony E. Maida, and Elizabeth A. Czerepak ("Defendants" and together with the Plaintiff and Spectrum, the "Parties") jointly submit this Stipulation ("Stipulation"), and in support thereof state as follows:

1 **WHEREAS**, on March 15, 2022, Plaintiff filed the above-captioned action purportedly in
2 the right, and for the benefit, of Spectrum against Defendants (the "Action");

3 **WHEREAS**, on or about July 31, 2023, Spectrum completed a merger transaction that
4 resulted in Plaintiff no longer being a stockholder of the Company and, accordingly, no longer
5 having standing to pursue derivative claims on the Company's behalf; and

6 **WHEREAS**, the Parties hereby certify that no compensation in any form has passed
7 directly or indirectly to Plaintiff or its attorneys in the Action and no promise to give any such
8 compensation has been made;

9 **IT IS HEREBY STIPULATED AND AGREED**, by the parties hereto that pursuant to
10 Federal Rules of Civil Procedure 23.1(c) and 41(a), this Action is dismissed.

11 MORRIS KANDINOV, LLP

PISANELLI BICE PLLC

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13 By: /s/ Leonid Kandinov
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Turgeon, Kurt A. Gustafson, Francois Lebel,
William L. Ashton, Nora E. Brennan, Seth
H.Z. Fischer, Jeffrey L. Vacirca, Dolatrai M.
Vyas, Bernice R. Welles, Stuart Krassner,
Raymond W. Cohen, Anthony E. Maida,
and Elizabeth A. Czerepak and for
Nominal Defendant Spectrum
Pharmaceuticals Inc.*

21 Based on the parties' stipulation, this case
22 is dismissed. The Clerk of Court is kindly
23 instructed to close this case.

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UNITED STATES DISTRICT JUDGE

26 DATED: 10/24/2024

27 CASE NO. 2:22-CV-00466-CDS-DJA
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